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Hon. Joseph J. Farnan, Jr.
U.S. District Court for the District of Delaware
J. J. Caleb Boggs Federal Building
844 N. King Street
Room 4124
Lockbox 27
Wilmington, DE 19801

VIA: ELECTRONIC FILING AND HAND DELIVERY

Re: [Romdhani v. ExxonMobil, No. 1:07-cv-715](#)

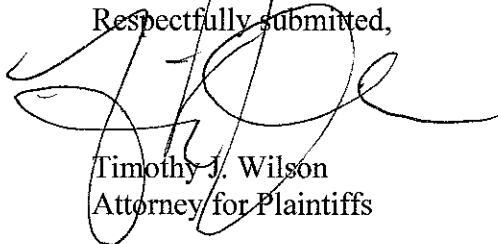
Dear Judge Farnan:

Please find enclosed a courtesy copy of Plaintiff's Unopposed Motion for Leave to File Second Amended Complaint, along with a copy of the Second Amended Complaint.

Plaintiff's Second Amended Complaint voluntarily removes any claims opposed by Defendant in its Motion to Dismiss and to Strike that was filed in December 2007 and which is still outstanding (Defendant moved to dismiss Plaintiff's Delaware Discrimination in Employment Act claims). Therefore, Defendant's Motion is now moot.

Plaintiff's initial Complaint was filed in November 2007, but due to Defendant's outstanding motion, the parties have not had an opportunity to engage in discovery – something Plaintiffs are certainly eager to do in order to move this case forward. Accordingly, Plaintiffs respectfully request that the Court issue a Scheduling Order in this case, or set a status conference to discuss this matter so that Plaintiff's can proceed with discovery.

Counsel is available should Your Honor wish to confer on this matter.

Respectfully submitted,

Timothy J. Wilson
Attorney for Plaintiffs

Enclosures

cc: Avi Kumin, Esquire
Joseph Caldwell, Esquire, Counsel for ExxonMobil (by e-mail and first-class mail)